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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WEBSITE MANAGEMENT SYSTEMS,
LLC, a Nevada Limited Liability
Company

Case No.: 2:20-cv-00213

Plaintiff,

v.

BENJAMIN DAILEDA, an individual
residing in Nevada, MELVIN OMAN, an
individual residing in Nevada, DEVAN
HIRST, an individual residing in Nevada,
YES WE WILL, INC., a Nevada
Corporation, and DOES 1-X,

Defendants.

**DECLARATION OF ROBERT RASKIN IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

DECLARATION

I, Robert Raskin, declare as follows:

1. I am a consultant to Website Management Systems, LLC ("WMS") which is a
Nevada Limited Liability Company with a principal place of business at 7241 W. Charleston,
Las Vegas, NV 89117. I manage many aspects of WMS business in association with my wife,
Kathleen Raskin, who is the Managing Member of WMS.

2. While WMS has determined with factual certainty that existing and would-be
customers of WMS have been contacted by Defendants through Yes We Will, Inc. and its 1st
Page Group, I have also seen an increase in the number of requests for refunds since Defendants
Daileda, Oman and Hirst left to start their competing business. I strongly believe this increase is

DECLARATION OF ROBERT RASKIN

1 due to Yes We Will, Inc. and 1st Page Group contacting our existing and would-be customers. It
2 is also noted that the refund requests are coming from customers that were signed up with WMS
3 by Benjamin Daileda while he was an employee of WMS. These requests for refunds are
4 directly placing WMS' merchant accounts at risk. Without the merchant accounts, WMS'
5 business as a whole is in jeopardy.

6 3. WMS is a computer-reliant company and has in excess of 70 computers on hand
7 at its facility. There are also a significant number of speakers for the computers. I have never
8 been informed by any employee, including Benjamin Daileda, that they were in need of
9 computer speakers. Nor was I made aware that Benjamin Daileda was forwarding business calls
10 to his personal email address or I would have immediately put a stop to such improper actions.

11 4. On or about January 1, 2015, WMS took over for KJR Management as the
12 employee management arm for the business including overseeing the rights to the various
13 agreements (e.g., employment and confidentiality agreements) that the employees had signed
14 with KJR. The employees were made aware of the change. (See, Exhibit A hereto). KJR
15 remains active and handles various WMS matters. Both entities have the same manager and are
16 run by Kathleen Raskin.

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Dated: March 2, 2020

ROBERT RASKIN

DECLARATION OF ROBERT RASKIN